

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

ROBIN MESEY and	)	
JENNIFER MESEY,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No. 1:19-CV-71
	)	
CITY OF VAN BUREN, MISSOURI,	)	
ALONZO BRADWELL, <i>in his official</i>	)	
<i>Capacity as Chief of Police,</i> and	)	
CHARLES ROPER, <i>in his individual</i>	)	
<i>capacity,</i>	)	
Defendants.	)	

**MOTION FOR SUMMARY JUDGMENT OF DEFENDANTS CITY OF VAN  
BUREN, MISSOURI AND ALONZO BRADWELL, IN HIS OFFICIAL  
CAPACITY AS CHIEF OF POLICE**

COME NOW Defendants City of Van Buren, Missouri and Alonzo Bradwell, in his official capacity as Chief of Police, by and through their counsel, Keck & Phillips, L.L.C., and pursuant to Federal Rule of Civil Procedure 56, and along with their Memorandum in Support of Motion for Summary Judgment, and Statement of Uncontroverted Material Facts, both of which are incorporated by reference herein, state the following in support of their Motion for Summary Judgment:

1. Plaintiffs' allegations, when compared with the undisputed facts and law show that Plaintiffs have failed to state any claim against the Moving Defendants for which relief can be granted.

2. Accordingly, both Moving Defendants are entitled to summary judgment as a matter of law.

WHEREFORE, Defendants City of Van Buren, Missouri and Alonzo Bradwell, in his official capacity as Chief of Police, move the Court for an Order granting Summary Judgment in their favor, on all issues raised in Plaintiffs' Complaint. costs, and such further and additional relief as the Court deems just.

**KECK & PHILLIPS, L.L.C.**

By: /s/ Damon S. Phillips

Damon S. Phillips #52901

3140 E. Division

Springfield, Missouri 65802

Phone: 417-890-8989

Fax: 417-890-8990

Email: [damon@kpwlawfirm.com](mailto:damon@kpwlawfirm.com)

*Attorneys for Defendants City of Van  
Buren, Missouri and Chief Alonzo  
Bradwell in his official capacity*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served by ☒ Filing electronically (ECF) on this 3<sup>rd</sup> day of December, 2020 to the following persons:

James W. Schottel, Jr.  
906 Olive St., PH  
St. Louis, Mo 63101  
[jwsj@schotteljustice.com](mailto:jwsj@schotteljustice.com)

Portia C. Kayser  
1010 Market St., Ste 1650  
St. Louis, Mo 63101  
[pkayser@fisherpatterson.com](mailto:pkayser@fisherpatterson.com)

/s/ Damon S. Phillips  
*Attorney*